

PERMIT CONDITIONS

Woodstuff Manufacturing Inc

Permit Number 96-0130

July 31, 1997

The numerical section references in this Permit are based on Maricopa County Air Pollution Control Rules and Regulations (Rules) in effect on the date of issuance of these Permit Conditions. In the event that these rules are revised to change the numerical references during the term of this Permit, the revised numbering system will apply to this permit.

GENERAL CONDITIONS:

1. **Annual Compliance Certification:** The Permittee shall file an annual compliance certification with the Maricopa County Department of Environmental Services (Department), Attn: Air Quality Compliance Supervisor. The compliance certification shall be filed on a form and in the manner specified by the Maricopa County Air Pollution Control Officer (Control Officer).
2. **Certification:** Any document which is required to be submitted by this Permit or the Rules shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
3. **Controls:** Except as provided by the applicable Rules or these Permit Conditions, the Permittee shall not operate any equipment or process unless air pollution controls, required by either this Permit or the Rules, are in place, are operating without bypass, and are operating within their design parameters and in accordance with any other conditions specified in this Permit. This requirement to operate any required air pollution control equipment may be temporarily waived:
 - a. for good cause if advanced written approval is obtained from the Control Officer, or
 - b. for preventative maintenance of the control device if the shutdown is allowed in the control's Operation and Maintenance Plan which has been approved in writing by the Control Officer.

The Permittee shall notify the Control Officer, in accordance with Rule 220, before making any additions, modifications or replacements to any air pollution control equipment. This notification requirement does not apply to normal maintenance and repair activities.

4. **Fees:** The Permittee shall pay, in a timely manner, an annual fee for this Permit as determined by the Control Officer in accordance with Rule 280.
5. **Fugitive Dust:** The Permittee shall take all reasonable precautions to minimize the emissions of fugitive dust in accordance with §300 of Rule 310.

6. **Leased/Rented/Borrowed Equipment:** If the Permittee leases, rents, or lends any equipment covered by this permit to a second party, the Permittee shall provide the second party with a copy of this Permit. It is the responsibility of the person using the equipment to make sure that the equipment is properly permitted and operated. If the Permittee does not provide the second party with a copy of this Permit, both the Permittee and the second party shall be responsible for operating the source in compliance with the Permit and for any violation thereof.
7. **Maintenance:** The Permittee shall keep all equipment under this Permit in good working order through an active maintenance program established in accordance with the approved Operation and Maintenance Plans or, in its absence, with manufacturers' recommendations, and generally accepted industry standards.
8. **Malfunctions (Emergency Upsets):** A malfunction that causes emissions in excess of those allowable by either the Rules or these Permit Conditions shall constitute a violation. Any affirmative defense of a violation caused by a malfunction shall be documented in accordance with §501 of Rule 100.
9. **Material Containment:** Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution.
10. **Modifications:** The Permittee shall notify the Control Officer, in accordance with the Rules, of changes, replacements or additions to the source which are not covered by this Permit.
11. **Odors:** The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.
12. **Operations:** The Permittee shall operate all equipment and processes in accordance with these Permit Conditions, applicable approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.

The Permittee shall halt or reduce activities if necessary in order to maintain compliance with these Permit Conditions, all approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.
13. **Portable Sources:** If this Permit is for a portable source, the Permittee shall notify this Department, Attn: Air Quality Compliance Supervisor, in writing at least ten days

in advance of moving to any location in Maricopa County. The notification shall include, at a minimum, the information required by §410 of Rule 200.

If the proposed location will have additional sources of air pollution under the control of the Permittee, the notification shall also contain a summary of the projected and allowable emissions for these additional sources.

The ten day notification requirement may be waived if both of the following conditions are met:

- a. the Permittee can demonstrate to the satisfaction of the Control Officer that an emergency situation existed, and
- b. the Permittee notifies the Department of the required information by telephone as soon as is practical and follows up with a written copy within seven days.

The Permittee shall submit any fees required by Rule 280 at the time that the notification is filed.

If the Permittee obtains an air quality permit from the Arizona Department of Environmental Quality (ADEQ) for any source covered by this Permit, the Permittee shall provide a copy of the ADEQ permit to the Department within 30 days of its issue.

14. **Record Keeping:** The Permittee shall maintain accurate records as required by these Permit Conditions and by Section 500 of all applicable Rules. These records will be kept in a form which allows easy verification of compliance with these Permit Conditions and any applicable Rules.

All records shall be kept for a minimum of three years except that all records required to demonstrate that an air pollution control device is being operated properly shall be retained for five years.

All records required by this Permit shall be made available for inspection upon request by a representative of the Control Officer.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this permit.

15. **Renewal:** The Permittee shall file an application for a permit renewal at least six months, but not more than 18 months, before the expiration date of this Permit.

16. **Reopening For Cause:** This Permit shall be reopened or revised prior to expiration under any of the following conditions:
 - a. either the Control Officer or the Administrator of the United States Environmental Protection Agency (Administrator) determines that this Permit

contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of this Permit, or

- b. either the Control Officer or Administrator determines that this Permit must be revised or revoked to assure compliance with the applicable requirements.

- 17. **Reporting:** If notified, the Permittee shall submit an annual emissions inventory report to the Control Officer. The report shall summarize the activities and air pollution emissions from the facility during the previous calendar year in accordance with §507 of Rule 100. The report shall be filed on a form supplied by the Control Officer and shall be due by April 30 or 90 days after the Control Officer makes the forms available, whichever is later.

The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising or revoking and reissuing this Permit or to determine compliance with this Permit.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this Permit.

The Permittee shall file any additional reports required by the Control Officer in a complete and timely manner.

- 18. **Right to Entry:** The authorized representative of the Control Officer, upon presentation of credentials, shall be permitted:
 - a. to enter upon the premises where the source is located or emissions-related activity is conducted, or in which any records are required to be kept under the terms and conditions of this Permit, and
 - b. to have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this Permit, and
 - c. to inspect any source, at reasonable times, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required in this Permit, and
 - d. to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this Permit or other applicable requirements, and
 - e. to record any inspection by use of written, electronic, magnetic, and photographic media.

No claim of confidentiality for trade secrets or commercial information available to the Permittee under Arizona Revised Statutes (ARS) 49-487 or Rule 200 §400 can limit the scope of or otherwise interfere with an on-site inspection by a representative of the Control Officer.

19. **Rights and Privileges:** This Permit does not convey any property rights nor exclusive privileges of any sort.
20. **Severability:** The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.
21. **Start-up Notification:** The Permittee shall give written notification to the Department, Attention Compliance Supervisor, at least 7 days but no more than 30 days before the initial start-up of any new equipment or process. Start-up shall be defined as the use of any equipment or process covered by this Permit in a manner that emits or controls a regulated air pollutant. However, startup shall not be considered as having occurred if the equipment or process is operated solely for the purpose of calibration or test runs.
- This startup notification does not apply to processes or equipment recognized by the Control Officer as being trivial or insignificant activities.
22. **Temporary Equipment:** The Permittee shall notify the Control Officer and obtain appropriate approval, in accordance with the Rules, prior to the installation or operation of any temporary or contractor operated equipment not covered by this Permit.

SPECIFIC CONDITIONS:

23. **Allowable Emissions:** The Permittee shall not allow emissions into the atmosphere in excess of any of the following:

	Monthly Emission Limits	Twelve Month Rolling Average Emission Limits
Volatile Organic Compounds (VOCs)	10 tons	98 tons
Total Federal Hazardous Air Pollutants	1.1 ton	12 tons
Any Single Federal Hazardous Air Pollutant	0.5 ton	4.5 tons
Particulates Less Than 10 Microns (PM10)	1 ton	10 tons

The twelve month rolling average shall be calculated at the end of each calendar month by summing the emissions over the most recent twelve calendar months.

The Permittee shall provide the choice of compliance option with applicable record keeping, reporting and any other requirements pursuant to these permit conditions, and Rule 342 of Maricopa County Air Pollution Control Regulations, to the Department within 60 days of the issuance of the permit.

The Permittee shall obtain Department's prior approval before switching the compliance option.

Compliant Coating Option

24. Limitations-Volatile Organic Compounds (VOC) Content:

The Permittee shall limit the VOC content of the topcoats or sealers applied to the wood furniture or fixtures to the following pounds of VOC per pound of solids (kg VOC/kg solids):

a.	Topcoat	1.8
b.	Sealer	1.9
c.	Acid-cured, alkyd amino topcoat	2.0
d.	Acid-cured, alkyd amino vinyl sealer	2.3

The Permittee is allowed to use sealer with no VOC limit if the topcoat contains no more than 0.8 lb VOC/lb solids (0.8 kg/kg).

For single coat applications, the Permittee shall limit the VOC content of the coating to 2.0 lb/lb (2.0 kg/kg) or 2.3 lb/lb (2.3 kg/kg) for an alkyd amino vinyl coating. The equipment and containers used for single coats including but not limited to gun or hose shall clearly labeled "FOR SINGLE COATS ONLY".

The Permittee shall not use strippable Booth Coatings more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

25. General Maintenance

The Permittee shall operate and maintain in proper working order all process equipment in which VOC-containing materials are used or stored.

26. Limitation of Conventional Air-Atomized Spray:

The Permittee shall not use a conventional air-atomizing spray gun nor any air-atomizing spray gun which is for use above 12 psig (0.8 Bar), except to apply finishing materials that have a VOC content not exceeding 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids).

Evidence of Transfer-Efficient Spray Equipment: The permittee shall not spray wood furniture with coating exceeding 1 kg VOC/kg solids (1 lb/lb) without providing evidence of possession and use of a low pressure spray gun or system; an electrostatic system; or a system in which the energy for atomization is provided principally via hydraulic pressure; this includes air assisted airless and ultra-low-volume-air assisted technologies. This requirement does not apply to facilities or activities which are either totally exempted or partially exempted from the provisions of the Rule 342 and also for small source status. This requirement is also not applicable to a specific system which is approved by the Control Officer as having a transfer efficiency consistently exceeding 64%.

27. **Exemptions:**

Total Exemption: The following materials are exempt from this rule: adhesives, architectural coatings, printing ink, coatings in aerosol spray cans not exceeding 22 fl. oz. (0.66 liter) capacity used exclusively for touch-up and/or repairs, and coatings not applied on or over a wood-product substrate.

Partial Exemptions:

- a. The following shall be exempt from applicability of VOC limitations and limitation of conventional air atomized spray.
 - (1) The use of the following coating types when the annual total use of all such types together is less than 250 gal (948 liters): prepackaged aerosol spray cans which are not used for touch-up or repair; metal leaf finishes; and faux finishes.
 - (2) Refinishing, replacement, and custom replica furniture operations: Any refinishing operation necessary for preservation, to return the furniture or fixture to original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture. The Permittee shall designate the paint booths and the spray guns for this purpose with appropriate tagging.
- b. The coatings for a single resin-layer finish which do not exceed a VOC limit of 3 lb VOC/lb solids (3 Kg/Kg) are exempt from the VOC-limits of Subsection 301.1 of Rule 342 of Maricopa County Air Pollution Control Regulations if all of the following conditions are met:
 - (1) The containers are clearly marked "FOR USE IN SINGLE RESIN-LAYER FINISH";

- (2) Facility records clearly identify this material: "DOES NOT MEET THE COATING VOC LIMITS OF RULE 342. - FOR USE ONLY IN SINGLE RESIN-LAYER FINISHES"; and
- (3) The booth used to apply the single resin-layer finish is dedicated to that operation only, and is clearly labeled "FOR SINGLE RESIN-LAYER FINISHES ONLY".

28. MONITORING AND RECORDS

The Permittee shall keep the following records and lists in a consistent and complete manner and shall make them available to the Control Officer without delay during normal business hours. Each record shall be maintained a minimum of five years.

Current List:

- a. **VOC-containing materials:** A current list of all VOC-containing material shall be maintained, which contains their name, or code. The VOC content of each coating including any qualified single resin-layer finish shall be expressed as lbs of VOC per lb coating solids (kg VOC /kg solids).
- b. **Mix ratios:** A current list shall be maintained of the manufacturer's recommended mix ratio of components, including but not limited to adding reducers and catalyst/hardeners, except when the manufacturer advises against any additions to the as supplied coating and has no recommendations or additions.

Monthly Schedule:

By the end of the following month, the Permittee shall update the following records for each month:

- a. Documentation showing the VOC content of the finishing material, as applied, in pounds VOC/pound solids (kg/kg) if solvent or other VOC is added at any time after the arrival of the finishing material at the facility.
- b. The amount of coating, the amount of catalyst/hardener, and the amount of reducer/coating diluent used.
- c. The quantity and type of organic solvent used each month for stripping and cleaning;
- d. The quantity of organic solvent disposed of off site during the month just ended.
- e. **Exception:** Update yearly the totals of the usage of each VOC-containing material known to be used in amounts less than 15 gallons (57 liters) per year.
Records associated with the Section 303 limitation on the use of conventional air-atomized spray equipment shall be kept. These

records shall show for each semi-annual period the total volume of all finishing material usage and the volume of finishing materials exceeding 1 kg VOC/kg solids (1 lb VOC/ lb solids) that is applied with conventional air-atomized spray equipment.

29. **Other:**

Storage/Disposal Of VOC Containing Material:

The Permittee shall store all VOC containing materials including finishing and cleaning materials in closed containers which are legibly labeled with their contents and which remain covered when not in use.

Cleanup And Cleaning Supply And Application Equipment:

The Permittee shall not clean spray booth components using a solvent containing more than 8.0 percent by weight of VOC, including water and non-precursor compounds, except for conveyors, continuous coaters and their enclosures, and/or metal filters. If the spray booth coating is being replaced, the Permittee shall use no more than 1.0 gallon (3.8 liters) VOC-solvent to clean the booth.

The Permittee shall collect all solvent used to clean spray guns into container(s) which shall be immediately closed after all the solvent has been collected.

The Permittee shall pump or drain all solvent used for line cleaning into a closed container.

The Permittee shall cover any tank used for stripping off coating or for cleaning substrate when the tank is not in use. Solvent-dragout shall be minimized by holding the object over the tank and tilting or rotating the object to drain off any pools of solvent back into the tank before removing the object from over the tank.

Labeling And Mislabeling:

The Permittee shall label all the supply lines or guns using tags, plaques, printing or embossing. Printed or embossed letters at least 3/8 inch (9.5 mm) high having high color contrast to the surface on which the letters are placed shall be used. The labeling shall be clearly visible to workers and to the Control Officer. In no case shall the labeling be more than 10 feet (3 meters) from an object while a coating requiring labeling is being applied.

These Permit conditions apply for both compliant coating option and averaging option

30. **Training:**

The Permittee shall fully train all the individuals before they are allowed to operate and/or maintain any surface coating equipment. The training shall include but not limited to equipment

usage, maintenance, and applicable reporting, record keeping requirements. The refresher training shall be given at least every six months.

31. Operation and Maintenance Plan (O&M Plan):

The Permittee shall submit an approvable O&M Plan for the baghouse in accordance with the Department guidelines, to the compliance manager of this Department for review within 30 days of the issuance of the permit.

As part of the O&M Plan, the Permittee shall establish the appropriate ranges for the key operating parameters for the baghouse. The Permittee shall monitor, operate and maintain the equipment in accordance with the approved O&M Plan.

32. Paint Booths

- a. The Permittee shall conduct all spray coating activities in a paint booth equipped with exhaust filters which are certified by the manufacturer and accepted by the Control Officer as having a minimum over spray removal efficiency of at least 92% for similar types of applications. The Permittee shall install and maintain the exhaust filters in accordance with the manufacturer's recommendations, with no gaps or visible openings.
- b. The exhaust from all paint booths shall be directed vertically up into the atmosphere.
- c. The Permittee shall follow the requirements of Rule 315 of Maricopa County Air Pollution Control Regulations to comply with the requirements of spray coating operations.

33. Woodworking Equipment

- a. The Permittee shall vent all wood working equipment without bypass, to a properly functioning baghouse. Stationary woodworking machinery that generate small quantities of wood dust such as a drill press, shaper, jointer, embosser, and a table saw that are located inside the manufacturing building and operated intermittently are exempted from the requirement of venting into the baghouse.

For the purposes of this Permit Condition, a properly functioning baghouse shall be defined as having a particulate removal efficiency of at least 90% by weight and is operating within the parameters specified in its approved Operation and Maintenance Plan.

- b. The Permittee shall not allow emissions from any woodworking operations in excess of 20 % opacity. The opacity determination shall be in accordance with EPA reference method 9.
- c. The Permittee shall follow reasonable control methods to control the particulate emissions in to the air during the transfer operation from baghouse to the disposal bins.

Averaging Option

34. Limitations-VOC Content:

The Permittee shall comply with the averaging formulas as set forth in Appendix A, Rule 342 of the Maricopa County Air Pollution Control (MCAPC) Regulations.

35. Applicability:

The averaging option as set forth in Appendix A, Rule 342 of MCAPC Regulations is applicable throughout the facility to all furniture coating lines occurring during the entire 24 hours of a work day.

In case of seeking an exemption from the applicability of the averaging option to a specific coating line, the Permittee shall submit a written request to the Control Officer within 30 days of the proposed date of operation and shall demonstrate the following :

- (a). The coating line seeking an exemption from the averaging option shall be physically separate from the operations involving averaging and
- (b). All monitoring, recordkeeping, and reporting for the coating equipment including coating reservoirs shall be kept separate from the operations involving averaging.

The Permittee shall maintain separate averaging options for separate lines after receiving the exemption as stated above. However, all requirements of Rule 342 of MCAPC Regulations must be complied with by each separated line.

- 36. Work Day Schedule:** The averaging option must be in place for no less than an entire 24 hour day period. The Permittee shall designate in writing a workday schedule beginning and ending at a specific time between 12:00 midnight and 4:30 AM. In case of a change in the work day schedule the Permittee shall notify the Control Officer at least five working days before the start of the intended new schedule.

37. Spray Guns:

The Permittee shall not use a conventional air-atomizing spray gun or other restricted use gun, except to apply finishing materials that have a VOC content not exceeding 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids).

Evidence of Transfer-Efficient Spray Equipment: The permittee shall not spray wood furniture with coating exceeding 1 kg VOC/kg solids (1 lb/lb) without providing evidence of possession and use of a low pressure spray gun or system; an electrostatic system; or a system in which the energy for atomization is provided principally via hydraulic pressure. This includes air assisted airless and ultra-low-volume-air assisted technologies. This requirement does not apply to facilities or activities which are either totally exempted or partially exempted from the provisions of Rule 342 of MCAPC Regulations.

38. Cleanup and Cleaning Supply and Application Equipment:

Booth Cleaning: The Permittee shall not clean spray booth components using a solvent exceeding 8.0 percent by weight of VOC, including water and non-precursor compounds, except for : conveyors; continuous coaters and their enclosures; and metal filters. If the spray booth coating is being replaced, a person shall use no more than 1.0 gallon VOC-solvent to clean the booth.

Cleaning Guns and Lines: The Permittee shall collect all solvent used to clean spray guns and shall pump or drain all solvent used for line cleaning into non-leaking container(s). Such containers shall be immediately closed or covered after all the solvent has been collected, and shall remain so except when in use.

39. Handling and Disposal of VOC

Use and Storage : The Permittee shall cover and keep covered each VOC containing material intended for the day's production, which is not currently in use. The Permittee shall store finishing and cleaning materials in closed containers.

Disposal of VOC and VOC-Containing Material : The Permittee shall store all VOC-containing materials, including, but not limited to, rags, waste coatings, waste solvents and their residues, in closed containers which are legibly labeled with their contents and which remain covered when not in use.

40. Credit Consuming Models: In accordance with Appendix A to Rule 342 of MCAPC Regulations, the Permittee shall identify and maintain permanent records for each credit consuming model indicating the model name and/or code. The records shall indicate the excess emissions over than the allowed limits based on the appropriate averaging formula. The excess emissions designation can be in the form of average grams of VOC above the formula limit, the maximum grams above the limit, number of exceeding grams at the first standard deviation, relative risk, or other appropriate designation.

41. **Compliance with Averaging Option:** The permittee at all times shall be able to prove compliance to the Control Officer pertaining to the averaging option. The Permittee shall supply a list of each coating participating in the averaging formula, along with the VOC content and coating category of each.
42. **Recordkeeping and Monitoring:** The Permittee shall follow sections 306 and 501.1, Rule 342, of Maricopa County Air Pollution Control Regulations, for designation and current list of VOC containing materials.

The Permittee shall comply with the following recordkeeping and monitoring requirements:

- (a). **Daily list of the Components:** Prior to applying any coating on an averaging day, the Permittee shall maintain a list of each coating name/code to be used that day in the averaging formula and its expected VOC content as applied. Upon request, the Permittee shall provide the daily list of the components to the Control Officer without delay.
- (b). **Daily Records :** The Permittee shall maintain hard copy results of each day's averaging. After each day using averaging, the Permittee shall determine the results of averaging for that completed production day by midday of the next working day. The hard copy results shall be maintained in a format approved by the Control Officer.
- (c). **Weekly Records:** The Permittee shall prepare weekly records of the workweek by the end of the first shift of the following workweek. The records shall indicate the total number of furniture pieces coated for each model and the quantity applied for each stain, washcoat, basecoat, sealer, topcoat and additives for dilution. The VOC content of the materials shall be designated as required in Rule 342 of MCAPC Regulations.
- (d). **Monthly Records:** The Permittee shall maintain monthly records for coatings that do not participate in the averaging formulas. The Permittee may report coatings of the same type under a single VOC-content value if their VOC contents are within plus or minus 2 percent of that value.

43. **Reporting:**

Semi-Annual Reports:

The Permittee shall submit semi-annual reports to the Department. The semi-annual report shall include a summary of the records, including all exceedances, by July 20 for

the first half of the year and by January 20 of the following year for the second half. The permittee shall include certified data sheets for coatings whose VOC content is determined by the supplier and not by the Permittee. The Permittee shall submit a certified statement signed by a responsible official of the facility that the coatings for which certified data sheets are submitted were the coatings actually used.

Initial Compliance Report:

The Permittee shall prove compliance with the averaging option as set forth in Appendix A, Rule 342 of MCAPC Regulations by submitting an initial compliance report to the Department within 60 days after the third day of averaging. The initial compliance report shall include all the elements that are required in the semi-annual reports.

Unavoidable Data Loss and Data Processing Equipment Malfunctions:

The Permittee shall maintain an accounting system in continual effect that allows the retrieval or reconstruction of data in case of data processing equipment malfunctions. The Permittee shall reconstruct the data in case of data loss and notify the Department within two working days. The Permittee shall submit hard copy results of retrieved information upon Department's request.

44. Limitation of Pre-RACT Coating Usage:

The Permittee shall comply with paragraph j, Appendix A, Rule 342 of MCAPC Regulations for the purpose of Pre-RACT coating usage.

45. Testing :

The Permittee shall perform EPA Method 24 test to determine VOC content of each coating material intended to be used in an averaging regime, prior to the usage. The testing shall be performed at the following levels of dilution:

- (a). Prior to adding any diluent;
- (b). With the minimum percent weight of solvent/diluent typically used in production;
- (c). With the maximum percent weight of solvent/diluent ever to be used in production.

The Permittee shall determine acetone content of each coating material intended to be used in an averaging regime, prior to the usage. The Permittee shall perform testing for acetone content at the three dilution levels mentioned

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above. The testing shall be performed in conjunction with Method 24 using EPA method 311 or other EPA approved methods.